

ONLY

ADMIN RECORD

FFPF 1000 01 (5/95)
Formerly FF 47940
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Document Modification Request

Print or Type all information (except signatures) Process procedures in accordance with 1-A01-PROC DEV 400, Procedure Process.

25. DMR No
96-DMR-ERM-0001

1 Name/Phone/Page/Location J Bray / 6698/6143/ T093B			2 Date 1/8/96		
3 Existing Document Number and Revision RF/ER-95-007 Revision #5			4 Document Type <input type="checkbox"/> Procedure <input checked="" type="checkbox"/> Plan <input type="checkbox"/> Other		
5 Document Title Sampling and Analysis Plan for the Remediation of Ryant Pit, OUA dated August 28, 1995					
6 Item	7 Page	8 Step	9 Proposed Modification		
#1	231	pg 4 #4	Delete the word "portable" from the sentence "Samples will be analyzed with a portable GC."		
10 Item					
10a. Justification (reason for modification, EJO #, TP #, etc.)					
#1 The use of a portable GC is not necessary, since the performance values have changed from a "percentage of removal" to actual cleanup levels Use of onsite GC will be conducted and will provide equals or greater quality than the portable GC.					

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11 <input type="checkbox"/> Process <input type="checkbox"/> Do Not Process (state reason in Block 10a)					
12 <input type="checkbox"/> Process (Complete Blocks 13-22) <input type="checkbox"/> Do Not Process (state reason in Block 10a)				13 New Document/ Rev No (if new or changed)	
Complete either Section 14a. or 14b. as applicable For procedures, attach completed Procedure Modification Worksheet from 1 A01 PROC DEV-400					
14a Type of Complete Modification		14b Changes (check all that apply)		Additional Attributes	
<input type="checkbox"/> New <input type="checkbox"/> Revision <input type="checkbox"/> One-Time-Use <input type="checkbox"/> Cancellation		<input type="checkbox"/> Intent Change <input checked="" type="checkbox"/> Nonintent Change <input type="checkbox"/> Editorial Correction <input checked="" type="checkbox"/> Regular <input type="checkbox"/> Interim Approval Requested <input type="checkbox"/> Needed for Immediate Use (14-day limit for obtaining final approval)		<input type="checkbox"/> Temporary <input type="checkbox"/> One-Time-Use <input type="checkbox"/> Limited Distribution	
15 ERM Change Control Board Required <input type="checkbox"/> Yes <input type="checkbox"/> No (Applicable only to new procedures, revisions and intent changes.)					
List the reviewing disciplines in Block 16. After concurrence has been obtained (in accordance with 1 A01-PROC DEV 400) enter the name of the reviewer followed by /s/ in block 17. If the reviewer indicates No comments, the review signature constitutes concurrence. Enter the date concurrence is obtained in Block 18.					
16 Organization	17 Reviewer/Concurrence	18 Date	16a. Organization	17a. Reviewer/Concurrence	18a. Date
QA	M Prochazka	1/8/96			
Anal. Actions	R.Z Hawk	1/15/96			
19 Assigned SME/Phone/Page/Location J R Bray / 6698/6143/ T093B			20 Cost Center 0203	21 Charge Number 988047-00	22 Requested Completion Date 1/15/96
23 Prescreen/Screen/USQD Number			24 Independent Safety Review Meeting and Date		
26 After obtaining ALL required signatures, Responsible Manager's Approval (print/sign/date) (Not required for New procedures or Revisions) R Z Hawk / Richard J. Hawk 09 JAN 96					27 Effective Date 1/15/96
DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE					28. Expiration Date (if applicable)

3) After completion of the excavation, samples will be collected to aid in determining if soil can be placed back into the trench after processing. Therefore, samples for metals and radionuclides will be collected after excavation, and before processing so that the data can be received early for prompt evaluation. The decision for metals and radionuclide containing soils to be returned to Ryan's pit after processing will be based on average radionuclide content being below the PPRGs listed in *Programmatic Risk Based Preliminary Remediation Goals*, USDOE February 1995 and the average TCLP concentration being below the limits for metals defined in 6 CCR 1007-3, Section 261.24

Data types: One composite sample made up of at least 5 subsamples will be collected from each, (up to 10) roll-off containers containing Ryan's pit soils. These subsamples will be collected in a systematic manner, and will be used to determine average metals and radionuclide content within the soil. The samples will be analyzed for radionuclides, and TCLP metals as described in Table 2.3-1 of Appendix B and Table 3.2 of the SAP.

4) Two questions will be answered relating to treatment of the VOC contaminated soils

- 1) What is the removal efficiency or percent reduction of the organic contaminants?
- 2) Are the VOC performance standards being met on the treated soil?

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Data types: Samples will be collected from every batch of soil, before and after treatment. The batch size is expected to be 3-5 cubic yards. The samples will be collected from approximately five subsample grabs as the soil is being loaded into the thermal desorption unit. Samples will be analyzed with a GC. Corresponding samples will be collected from the batch after processing (post processing samples) and analyzed in the same manner. The analyses will allow project personnel to determine removal efficiency of treated soils. In addition, approximately every 10 batches, a confirmatory triplicate sample will be collected and analyzed in an offsite laboratory for VOCs (in addition to a regular and duplicate sample for onsite GC analysis). These samples will allow for an evaluation that performance goals, as stated in the PAM/Permit Modification for the treatment unit, have been attained. After processing, the distribution of residual VOCs is expected to be homogenous thus allowing for the variation in sampling frequency from the metals and radionuclide sampling scheme.

Design Optimization. The optimum number of samples required to meet the decision errors specified for the documentation of residual contamination remaining at the boundaries of the trench excavation are given in Table 2.3-2. The number of samples given probably represents confidences slightly higher than those specified due to the statistical assumption of simple random sampling, while the actual sampling strategy consists of one biased toward historical knowledge, and therefore more probability of intersecting relatively higher volumes of contamination. The table also presents design parameters used in the Decision Error Feasibility Trials (DEFT), Version 4.0 (9/94) software by EPA.

The table consists of the most conservative (most protective of human health and environment) scenario with respect to the VOC volatile organic compounds, i.e., the lowest applicable PPRG, which is 5440 mg/kg for trichloroethene (TCE, construction worker in subsoil scenario). Comparisons of average real sample results with PPRGs must be made for each chemical of concern.